

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. 19-CR-4064
)	
Plaintiff,)	INFORMATION
)	
vs.)	Count 1
)	18 U.S.C. § 1343: Wire Fraud
GREGG PEDERSEN,)	
)	
Defendant.)	
)	

The United State Attorney charges:

Count 1

Wire Fraud

Introduction

1. In 2004, defendant GREGG PEDERSEN became a member of the Association of the Civilian Technicians (ACT) Local 75. Local 75 is comprised of the 185th Air Refueling Wing of the Iowa Air National Guard and the Iowa 133rd Air Wing. All members of the Local 75 are employees of the United States Department of Defense and enlisted in the United States Air National Guard.

2. In about 2007, defendant GREGG PEDERSEN became the Vice President of Local 75. Then, in about 2009 or 2010, defendant GREGG PEDERSEN became the President of Local 75, until January 20, 2018. Local 75 did not pay a salary to its officers. Local 75's income came from members' dues and those dues were deposited into a checking account ending in 3799 at Pioneer Bank in Sergeant

Bluff, Iowa, within the Northern District of Iowa. Defendant was one of the signatories on this account.

3. Local 75 also had credit cards tied to the Pioneer Bank Checking Account ending in 3799 and paid for by funds from the Pioneer Bank Checking Account ending in 3799. Defendant had one such credit card, in his name, known as an AT&T Universal Business Rewards Credit Card. Local 75's credit card, like Local 75's checking account, was to be used solely for Local 75's business. Defendant was not authorized to use the credit card, or the funds in the checking account, for his own personal benefit.

The Scheme to Defraud

4. As President of Local 75, beginning at least as early as November 1, 2012, and continuing through at least January 20, 2018, in the Northern District of Iowa, and elsewhere, defendant GREGG PEDERSEN did knowingly devise or intended to devise a scheme and artifice to defraud and to obtain the monies, funds, assets, and other property under the custody or control of the Association of the Civilian Technicians (ACT) Local 75 by means of false and fraudulent pretenses, representations, and promises ("the scheme to defraud"). In particular, defendant used and misappropriated approximately \$6,320.54 from the Local's checking and credit card accounts. Defendant used the misappropriated funds of Local 75 for his own purposes and not for the benefit of Local 75.

Manner and Means of the Scheme to Defraud

5. Defendant signed and issued unauthorized checks from the Local's checking account, made out to cash. Defendant then cashed those checks and used the money for his own purposes and not the benefit of Local 75. In addition, defendant used Local 75's credit card to make unauthorized purchases and cash withdrawals, to include purchases at various restaurants, fuel and convenience stores, foreign expenses, and other unapproved expenditures to include on-line purchases. Local 75 would then make monthly payments toward the debt owed on the Local's credit card issued in defendant's name. The unauthorized checks, cash withdrawals, and credit card expenditures were used for defendant's benefit and not the benefit of Local 75. Defendant caused automated clearing house (ACH) transfers from the Pioneer Bank account to other accounts, to pay defendant's personal expenses. Defendant was able to conceal his scheme from Local 75 as each month the monthly balances on the account and credit card were reported to Local 75, but the expenditures and withdrawals were not reported. Therefore, Local 75 did not know whether the monthly balances were on-going or new expenditures. Thus, defendant fraudulently withdrew and spent funds from the checking account at Pioneer Bank, and fraudulently caused transfers of funds from the Pioneer Bank account for defendant's personal benefit. For example, defendant issued and cashed at least eight unauthorized checks made out to "cash," made at least ten unauthorized cash withdrawals using Local 75's credit card, and incurred numerous unauthorized charges to Local 75's credit card, all for the benefit of defendant.

Execution of the Scheme to Defraud

6. Beginning no later than November 2012, and continuing through at least 2018, in the Northern District of Iowa, and elsewhere, defendant GREGG PEDERSEN knowingly devise or intended to devise a scheme and artifice to defraud and to obtain the moneys, funds, assets, and other property under the custody or control of the Association of the Civilian Technicians (ACT) Local 75 by means of false and fraudulent pretenses, representations, and promises.

PEDERSEN knowingly executed and attempted to execute the scheme by obtaining the monies of Local 75 to pay for unauthorized purchases he made for the benefit of himself through Local 75's credit card under his control and for his benefit, which vendors, lenders, creditors, and financial institutions used ACH wires to pay AT&T Universal Business Rewards Credit Card, including but not limited to the following:

Count	Account Holder	Date of wire	From/To	Amount
1	Local 75	7/13/2015	Iowa/Virginia	\$151

This was in violation of Title 18, United States Code, Section 1343.

PETER E. DEEGAN, JR.
United States Attorney

By: */s/ Matthew J. Cole*

MATTHEW J. COLE
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